

SANDERS LAW GROUP

Craig Sanders, Esq. (Cal Bar 284397)
Jacqueline Mandel, Esq. (Cal Bar 317119)
333 Earle Ovington Blvd, Suite 402
Uniondale, NY 11553
Tel: (516) 203-7600
Email: csanders@sanderslaw.group
Email: jmandel@sanderslaw.group
File No.: 128105

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Viral DRM, LLC,

Plaintiff,

v.

California Off Road Recovery
Group LLC,

Defendant.

Case No. 8:24-cv-00871-FMO-AS

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
DEFAULT JUDGMENT
PURSUANT TO FED. R. CIV. PRO.
55(b)(2)**

Judge: Hon. Fernando Manzano
Olguin

Magistrate Judge: Hon. Alka Sagar

Date: October 10, 2024

Time: 10:00 am

Location:

Courtroom 6D
350 West 1st Street
Los Angeles, California 90012

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT at 10:00 am on October 10, 2024, or
as soon thereafter as the matter may be heard, before the Honorable Fernando

Manzano Olguin, of the United States District Court for the Central District of California, in Courtroom 6D, 350 West 1st Street, Los Angeles, California 90012, Plaintiff Viral DRM, LLC (“Plaintiff”) will and hereby does move this Court for a default judgment against Defendant California Off Road Recovery Group LLC. Said motion will be made upon the grounds set forth in the accompanying Memorandum in Support of Plaintiff’s Motion for a default judgment, the Declaration of Jacqueline Mandel dated August 27, 2024, the Declaration of Brandon Michael Clement dated August 27, 2024, and the complete files and records of this action.

CONFERENCE OF COUNSEL

There has been no conference of counsel prior to making this motion, insofar as Defendant failed to timely appear, the Clerk entered a notation of Default against Defendant. In other words, there is no adverse party recognized by the Court with whom a conference could have been conducted.

DATED: August 27, 2024

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By: /s/ Jacqueline Mandel
Craig Sanders, Esq. (Cal Bar 284397)
Jacqueline Mandel, Esq. (Cal Bar 317119)
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Uniondale, NY 11553
Tel: (516) 203-7600
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Email: jmandel@sanderslaw.goup
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Case Name: Viral DRM, LLC v. California Off Road Recovery Group LLC
Case No.: 8:24-cv-00871-FMO-AS

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, declare under penalty of perjury that I am a citizen of the United States, and am over 18 years of age. My business address is 333 Earle Ovington Boulevard, Suite 402, Uniondale, New York 11553. I am not a party to this action. I have caused service of the following documents, described as:

**PLAINTIFF'S NOTICE OF MOTION AND MOTION
FOR DEFAULT JUDGMENT**

on the following parties by USPS mail on August 27, 2024 at:

California Off Road Recovery Group LLC
473 S. Carnegie Drive, Suite 200
San Bernardino California 92408

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: August 27, 2024

/s/ Laura Costigan

Laura Costigan